

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)
v.)
)
VANDELL WOODS,)
Defendant.)
)
)
CRIMINAL NO. 15-cr-10145-RGS

MOTION TO BE RETURNED TO NEW YORK STATE CUSTODY
(assented to)

Defendant, Vandell Woods, hereby moves this Honorable Court to continue the trial date in this case. Trial is currently scheduled to commence on November 6, 2017 and to continue through November 17, 2017.

As reasons therefore, the Defendant states that his counsel, the undersigned, is scheduled to represent the defendant in *Commonwealth v. Richard Haugh*, a rape of a child case where the defendant is incarcerated awaiting trial, at Middlesex Superior Court on the same date. This trial is scheduled to begin on November 6, 2017, is expected to involve expert testimony, and to last approximately two weeks.

The trial date in the Haugh matter was scheduled in April, 2017, before the trial date in this case, which was set on July 21, 2017.

In contrast to the defendant in the Haugh matter, Mr. Woods is currently serving a state prison sentence in New York, with an anticipated release date in late 2019, and will not be prejudiced by any delay.

Undersigned counsel has consulted with the government regarding this request. The government assents to this request for a continuance.

WHEREFORE, the Defendant requests the Court grant this motion, cancel the trial scheduled for November 6, 2017 at to Mr. Woods, and reschedule the trial to a later date after consultation with the clerk and the parties.

Respectfully submitted,
VANDELL WOODS,
By his attorney,

/s/ Ian Gold
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Date: September 5, 2017

CERTIFICATE OF SERVICE

I hereby certify that true copies of this document will be served on the registered parties through the ECF system on this date, Sept. 5, 2017.

/s/Ian Gold
Ian Gold